

**U.S. ENVIRONMENTAL PROTECTION AGENCY
REGION I - NEW ENGLAND
ONE CONGRESS STREET, SUITE 1100, BOSTON, MA 02114**

MEMORANDUM

DATE: February 12, 2001

SUBJ: RCRA Partial Inspection at the U.S. Army Corps of Engineers, Charlestown Navy Yard, Building 108, Boston, MA

FROM: Ginny Lombardo, Environmental Engineer
RCRA Technical Office, OES

THRU: Kenneth B. Rota, Chief
RCRA Technical Office

TO: File

RCRA RECORDS CENTER
FACILITY US Army Corp of Engineers
ID. NO. MA R000006767
FILE LOC. R-16
OTHER _____

I. General Information

A. Facility Name and Address: U.S. Army Corps of Engineers
Charlestown Navy Yard, Building 108
Former Boiler House
Boston, MA 02129

B. Facility Contact: James A. Moroco, Resident Engineer and
Captain Debbie Aconi
U.S. Army Corps of Engineers
New England District
North Central Resident Office
Unit 90 - 50 MacArthur Avenue
Ayer, MA 01432-4440

C. Date of Inspection: February 8, 2001

D. Purpose of Inspection: RCRA Partial Evaluation Inspection

E. Personnel Participating in Inspection:

U.S. EPA Region I Representatives:
Ginny Lombardo, RCRA Technical Office, OES

U.S. Army Corps of Engineers Representatives:
John W. McDowell, Construction Representative, USACE
Gary D. Cooper, Construction Representative, USACE
Don Ellis, Stone & Webster Engineering

II. RCRA Reporting/Information Requirements

- A. Facility ID Number: MAR000006767
- B. Type of Operation: Building Remediation
- C. Notification of Hazardous Waste Activity: February 22, 1996
- D. Classification: Large Quantity Generator (LQG)

III. Facility Description

The U.S. Army Corps of Engineers (USACE) Building 108 facility at the Charlestown Navy Yard is an old boiler house building that was closed in 1974. The USACE is currently in the process of conducting remediation of the building to remove any hazardous materials so that the building can be demolished. There is lead paint debris, asbestos containing materials and other wastes that have to be removed from the building. Remediation began in 1995 and lasted for 18 months before work had to stop in June 1996, because the USACE ran out of money for the project. During this time, 203 55-gallon drums of lead paint chips, EPA waste code D008, were shipped off-site. Stone & Webster recently was awarded the contract to begin remedial action at the site again. Stone & Webster conducted preliminary work, sampling and containment, prior to having to stop work and close the building due to hazardous structural conditions due to snow load. Remedial work is expected to begin when the weather permits. The USACE expects that they will not have enough money to complete the remedial work. When the funding is exhausted, the USACE will have to cease work again until more money is provided for the project.

IV. General Observations

Arrival and Discussion:

Ginny Lombardo arrived at the site trailer at approximately 9:30 am on 2/8/01. The inspector met with John McDowell and Gary Cooper, Construction Representatives representing the U.S. USACE, and Don Ellis, the Project Manager for Stone & Webster Engineering. During the inspection, the facility representatives explained the following:

- Building 108 was a boiler house that generated heat for buildings within the Navy Yard.
- The Navy Yard, including Building 108, was closed in 1974.
- The building is in poor shape structurally and work had to be done recently to secure a part of the roof that was beginning to collapse.
- The building is being remediated for removal of hazardous materials and asbestos prior to being demolished.
- The initial remediation work began in 1995 and lasted for 18 months, at which point the USACE ran out of money and had to stop the work.

- Stone & Webster Engineering is now the contractor assigned to begin remediation work again.
- Stone & Webster completed some preparation work, analytical and containment of the building, before they had to stop work due to hazardous structural conditions due to winter snow loads.
- Stone & Webster will begin remediation work at the site when weather conditions permit. Excerpts from the Remedial Action Work Plan, which depict the floor plan of the building and describe different phases of the remedial project, are attached.
- USACE expects that they will run out of money before the remediation work can be completed. Then, the project will be put on hold again until additional funding is allocated.
- Underground storage tanks, which were used for fuel oil, were removed from under the building in 1993.
- There was evidence that fuel from prior tanks had leaked into the soil.
- The USACE has been trying to make a deed restriction of the site due to the oil contamination, but the property owner, Boston Redevelopment Authority, has not signed the paperwork.

Physical Inspection:

A physical inspection of the building could not be performed because the building was closed due to hazardous structural conditions due to snow loads.

Record Review:

There was a 1/17/97 letter, copy attached, from Stephen Umbrell, Project Engineer at the USACE, to Robert Martinack, of MA DEP, requesting that MA DEP deactivate EPA ID number MAR000006767 as of June 1996, when remedial work at the site had been stopped. The letter explains that 200 55-gallon drums of lead waste were shipped off-site in January 1996. These were shipped under a temporary EPA ID number, the USACE phone number, because it was a one-time shipment from the site to Model City Landfill in New York. The letter further explains that 3 weeks later the USACE received a phone call from MA DEP explaining that use of a phone number is usually okay, but because of an interstate agreement with New York, the USACE would have to retroactively get an EPA ID No. and apply it to the site. Following this discussion, the USACE filled out an application and was given EPA ID number MAR000006767.

Manifests and Land Disposal Restriction Notices: Manifests and corresponding LDR Notices were reviewed. There were only 4 manifests. One was for 3 drums of hazardous waste solid containing lead shipped to General Chemical in Framingham, MA in November 1995 and the other 3 manifests were for the 200 drums of lead paint chips that were shipped off-site in January 1996 to Model City Landfill in New York. Copies of the manifests are attached to the inspection

report. The manifests to Model City Landfill in New York did not include copies of corresponding Land Disposal Restriction Notices.

Close-Out Conference:

The USACE representatives had to leave the site prior to the completion of the inspection. The USACE representatives requested that any concerns identified during the inspection be submitted to them in writing. The inspector told the USACE representatives that she would issue a letter identifying potential concerns within 3 weeks. The inspector explained to the USACE representatives that the EPA ID number for the site was not deactivated, according to information from the RCRA database. The USACE representatives explained that they wanted to keep the ID number active, at this point, since the remediation work, which is expected to begin again this spring, will likely result in the generation and off-site shipment of hazardous waste.